

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,	§	
Plaintiff,	§	
	§	JURY TRIAL DEMANDED
v.	§	
	§	
COMMSCOPE HOLDING COMPANY,	§	
INC., COMMSCOPE INC., ARRIS	§	
INTERNATIONAL LIMITED, ARRIS	§	
GLOBAL LTD., ARRIS US HOLDINGS,	§	Civil Action 2:21-cv-310-JRG
INC., ARRIS SOLUTIONS, INC., ARRIS	§	(Lead Case)
TECHNOLOGY, INC., and ARRIS	§	
ENTERPRISES, LLC,	§	
	§	
NOKIA CORP., NOKIA SOLUTIONS	§	
AND NETWORKS OY, and NOKIA OF	§	Civil Action No. 2:21-cv-309-JRG
AMERICA CORP.	§	(Member Case)
	§	
Defendants.	§	

**TQ DELTA, LLC’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANT NOKIA OF AMERICA CORP.’S MOTION TO DISMISS
UNDER RULE 12(B)(6) FOR FAILURE TO PLEAD COMPLIANCE WITH THE
ACTUAL NOTICE AND MARKING REQUIREMENTS OF 35 U.S.C. § 287(A)**

Now comes, Plaintiff TQ Delta, LLC (“TQ Delta”) and respectfully moves for a one-week extension of time, up to and including November 12, 2021, to respond to Defendant Nokia of America Corporation’s (“Nokia”) Motion to Dismiss Under Rule 12(b)(6) for Failure to Plead Compliance with the Actual Notice and Marking Requirements of 35 U.S.C. § 287(a) (“Motion”). Dkt. 20 filed in member case 2:21-cv-309-JRG. In support of its Motion, TQ Delta would respectfully show the Court as follows:

The deadline for TQ Delta to respond to Nokia's Motion is currently November 5, 2021. TQ Delta seeks this deadline not for delay but for good cause and so that justice may be served. TQ Delta has meet-and-conferred with Nokia, and Nokia does not oppose the relief requested in this Motion.

Plaintiff TQ Delta prays that the Court extend the deadline for it to respond to Nokia's Motion by one additional week, up to and including November 12, 2021.

Dated: November 1, 2021

Respectfully submitted,

By: /s/ Christian Hurt
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ATTORNEYS FOR PLAINTIFF
TQ DELTA, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served this November 1, 2021, on all counsel of record, each of whom is deemed to have consented to electronic service. L.R. CV-5(a)(3)(A).

/s/ Christian Hurt
Christian Hurt

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that Defendant Nokia of America Corporation is unopposed to this motion.

/s/ Christian Hurt
Christian Hurt